

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

CASE NO. 23-80101-CR-CANNON(s)

UNITED STATES OF AMERICA,

Plaintiff,

v.

**DONALD J. TRUMP,
WALTINE NAUTA, and
CARLOS DE OLIVEIRA,**

Defendants.

_____ /

GOVERNMENT’S NOTICE OF EXPERT TESTIMONY

The Government hereby files under Federal Rule of Criminal Procedure 16(a)(1)(G), Local Rule 88.10(o)(3), and this Court’s Order (ECF No. 215) the attached notices of intent to use expert testimony in its case-in-chief at trial:

- Attachment A: FBI Digital Forensic Examiner Gabriela Mancini, Computer Analysis Response Team
- Attachment B: FBI Digital Forensic Examiner/Special Agent Stacy Shahrani, Computer Analysis Response Team
- Attachment C: FBI Digital Forensic Examiner/Supervisory Special Agent Henry K. Ha, Computer Analysis Response Team
- Attachment D: FBI Special Agent Andrew Kochy, Computer Analysis Response Team
- Attachment E: FBI Special Agent Johnathon Hoyt, Cellular Analysis Survey Team
- Attachment F: FBI Senior Computer Scientist David Loveall II, Operational Technology Division

Having provided a complete statement of these expert witnesses' qualifications, opinions and anticipated testimony, and the basis for their opinions, the Government requests the reciprocal disclosures required by Federal Rule of Criminal Procedure 16(b)(1)(C) and Local Rule 88.10(o)(3) – the latter of which typically requires an “initial written summary” within 14 days of the request – by a date to be set by the Court.

Respectfully submitted,

JACK SMITH
Special Counsel
N.Y. Bar No. 2678084

By: /s/ Jay I. Bratt
Jay I. Bratt
Counselor to the Special Counsel
Special Bar ID #A5502946
950 Pennsylvania Avenue, NW
Washington, D.C. 20530

David V. Harbach, II
Assistant Special Counsel
Special Bar ID #A5503068

Michael E. Thakur
Assistant Special Counsel
Florida Bar No. 1011456

Anne McNamara
Assistant Special Counsel
Special Bar ID #A5501847

January 12, 2024

CERTIFICATE OF SERVICE

I hereby certify that on January 12, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which in turn serves counsel of record via transmission of Notices of Electronic Filing.

/s/ Michael E. Thakur
Michael E. Thakur